IN THE EUROPEAN PATENT OFFICE

Applicant : America Online, Inc. et al.
Appln. No.: PCT/US98/27217
Int'l Filing Date: 22/12/1998
Priority Date: 24/12/1997
Title   : DATA LOCALIZATION

European Patent Office
PCT/ International Preliminary Examining Authority
D-80298 Munich, GERMANY

Attention: N. Glaser
Authorized officer/Examiner

RESPONSE TO WRITTEN OPINION

The present response is submitted in complete response to the Written Opinion mailed 21 October 1999.

The specification and claims have been amended as indicated in the replacement pages attached to this response. Minor typographical errors have been corrected on page 1 lines 12 and 13; page 2 line 21, and page 5 line 27 of the specification. In addition, lines 3-5 of page 1 and lines 7-8 of page 9 of the specification have been deleted, as suggested in the written opinion. Claims 1-21 have been amended in order to clarify the claim language as requested in the written opinion and the amendments are explained in further detail below. A courtesy copy of the specification and claims is also attached for the Authorized Officer/Examiner's convenience showing all the changes made by the amendments. In the courtesy copy deleted language is shown in brackets and added language is shown in bold.

SECTION III

In Section III of the written opinion, claims 2, 3, 14, and 17 were indicated as allegedly being so unclear that it was not practicable to carry out examination of these claims. Accordingly, claims 2, 3, 14, and 17 have been amended to clarify the claimed subject matter and favorable examination of these claims is now respectfully requested.

Applicant : American Online, L~~~~ al.
Serial No. : US98/27217
Filed : 22.12.98
Page : 2

Attorn~~~~ocket No.: 06975-029WO1
09/582261

534 Rec'd PCT/PTC 23 JUN 2000

SECTION V

Section V of the written opinion indicated that claims 1, 4-13, 15, 16, and 18-21 allegedly lacked novelty and inventive step in light of document D3 ("Routing of Incoming Calls in an X.25 System" IBM Technical Disclosure Bulletin, vol. 32, no. 11, 1 April 1990, pages 370-372). Applicant respectfully disagrees with these assertions for the following reasons.

D3 describes the routing of incoming calls in an X.25 system. A router table is described as containing information about incoming calls. According to the description of D3, the disclosed method allows an application to specify in advance which calls the application wants to receive. Three fields of the router table (i.e., Calling address, Called address, and Call user data) are grouped together and collectively defined as a "NAME." According to the method described in D3, an application registers itself as wishing to receive calls corresponding to the NAME (defined as LISTENING in D3). In this way, calls that are considered a "best match" to the NAME are routed to applications that are LISTENING for the NAME; otherwise, the calls are rejected if no application is LISTENING for the NAME that is determined by the router to be associated with the calls.

With regard to claim 3, the written opinion indicates "querying a host system database to obtain localized information service data" corresponds to "(D3: the 'router table' serving as said database, page 371)." The written opinion goes on to indicate "sending the localized information service . . ." corresponds to "(D3: 'subaddress' and performing an action, page 371)." Applicant respectfully disagrees with this characterization of D3 with respect to Applicant's claims.

Applicant's claim 3, recites, among other things, "a terminal server having a location" and the steps of "receiving at a host system, terminal server identification from a terminal server; querying a database to obtain service data, specific to the location, based on the terminal server identification; and automatically sending the location specific service data from the host system to the terminal server." However, D3 does not query the router table to obtain data (location specific or otherwise) to be sent to the terminal server that sent the terminal ID, as alleged in the written opinion. In marked contrast to Applicant's claimed invention, D3 accesses the router table to determine where a packet should be routed (e.g., to an application that is listening) but D3 does not then send service data (location specific or otherwise) obtained from the router table to a terminal server that sent the data packet. Furthermore, the SUBADDRESS identified in the written opinion

Applicant : American Online, In[●]al.
Serial No. : US98/27217
Filed : 22.12.98
Page : 3

Attorn[●]ocket No.: 06975-029WO1

as corresponding to "the location specific service data" is not data that is specific to the location of the terminal server that sent the packet or call. As a result, Applicant's claim 3 cannot be said to lack novelty or inventive step.

Claim 11 recites, among other things, "a processor configured to receive the terminal server identification from the data interface, to query the database for location specific service data associated with the terminal server identification, and to send the location specific service data obtained by the query to the data interface for transmission to the terminal server," and claim 16 recites a program apparatus including, among other things, instructions to "receive terminal server identification from a terminal server; query a database to obtain location specific service data associated with the terminal server identification; and send the location specific service data to the terminal server." It is respectfully submitted that D3 also fails to describe or suggest at least these features of Applicant's invention for the reasons given above.

Claims 2-10, 12-15, and 17-21 depend from claims 1, 11, and 16, respectively, and are believed to have novelty and inventive step for at least the reasons given for claims 1, 11, and 16.

SECTIONS VII-VIII

Sections VII-VIII indicated certain alleged deficiencies in form, content, and clarity. It is respectfully submitted that the amendments to the claims and the specification overcome each of these alleged deficiencies.

With regard to item 1, the written opinion indicated that the feature "localized information service data" and the "association [of this data] with the terminal identification data" was not understood. The claims have been amended to change "localized information service data" to "location specific service data." As explained with regard to novelty and inventive step (and in detail in Applicant's specification), a database associated with a host system contains service information that is specific to a location. For example, the database may contain service data (the weather forecast) for a specific location (such as New York City). In addition, a terminal server has a location, for example, New York City. The terminal server also has a terminal identification (ID), for example, a network address. The terminal server (located in New York City) sends the ID to a host system. The host system then queries a database to obtain service data (e.g., the weather forecast) specific to the location (e.g., New York City) based on

the terminal server ID. The host system then automatically sends the location specific service data (the New York City weather Forecast) to the terminal server. In this way, service data can be supplied to a client computer utilizing the server without the client having to previously log in location information that is specific to the client (as is necessary in prior art systems).

In addition, the written opinion also indicated that the features "location data" "determining a location" and "determined location" were not understood. Although Applicant believes that this language has its plain meaning and is clear in light of the context of the claims, Applicant has amended the claims to further clarify that the term "location" is the location associated with the terminal server (i.e., the place where the terminal server is located). A location, as defined in Webster's II New College Dictionary is simply "a place were something is or might be located." As described in the specification, the location may be a physical location or a logical location.

With regard to item 2.1, Applicant respectfully asserts that all essential features needed to solve the claimed invention are recited in the claims.

With regard to item 2.2, the claims have been amended to include parenthetical references as suggested in the written opinion.

With regard to item 3.1, the references to the patent applications on page 1 have been deleted and thus items 3.2 and 3.3 have been rendered moot.

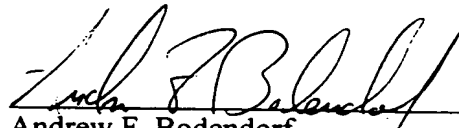With regard to item 3.4, the alleged vague statement on page 9 has been deleted.

Accordingly, an indication of novelty, inventive step,. and industrial applicability for claims is respectfully requested.

Respectfully submitted,

Date: _21 January 2000_

[signature]

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